

Kami E. Quinn
Gilbert LLP
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

:
:
:
:
:
:
:
:
:

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY-THIRD MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD JUNE 1, 2022 THROUGH JUNE 30, 2022**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	June 1, 2022 through June 30, 2022
Amount of compensation sought as actual, reasonable, and necessary:	\$430,020.40 (80% of \$537,525.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$6,035.30 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this thirty-third monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing June 1, 2022 through June 30, 2022 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$537,525.50 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$430,020.40.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$816.83. The blended hourly rate of paraprofessionals during the Application Period is \$275.59.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred and paid during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred and paid \$6,035.30 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$6,035.30.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$430,020.40 (80% of \$537,525.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$6,035.30 (100%), for a total amount of \$436,055.70 for the Application Period.

Dated: August 24, 2022
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

Kami E. Quinn
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	3.3	\$660.00
A009	Meetings / Communications with AHC & Creditors	2.0	\$3,050.00
A015	Non-Working Travel (Billed @ 50%)	4.8	\$2,040.00
A019	Plan of Reorganization / Disclosure Statement	1.5	\$2,700.00
A020	Insurance Adversary Proceeding	738.9	\$529,075.50
		750.5	\$537,525.50

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia – 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade – 1984 U.S. Supreme Court – 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation – 2017 U.S. Court of Federal Claims – 2019	\$1,800	2.5	\$4,500.00
Kami Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,250	1.0	\$1,250.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,450	51.0	\$73,950.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,450	78.6	\$113,970.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$850 \$425 ²	129.7 4.8	\$110,245.00 \$2,040.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia – 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court – 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$785	7.1	\$5,573.50
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$700	85.5	\$59,850.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$660	57.6	\$38,016.00
Alison Gaske	Associate / District of Columbia – 2016	\$610	37.3	\$22,753.00
Ethan Kaminsky	Associate / State of New York – 2018	\$560	9.1	\$5,096.00
Janet Sanchez	Associate / Commonwealth of Virginia - 2020	\$475	32.5	\$15,437.50
Ifenanya Agwu	Associate / District of Columbia – 2022	\$420	64.8	\$27,216.00
December Huddleston	Associate / District of Columbia – 2021	\$420	20.3	\$8,526.00
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365	29.2	\$10,658.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425	23.7	\$10,072.50

² Non-working travel is billed @ 50% of regular hourly rate.

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator– Joined firm in 2018	\$375	10.2	\$3,825.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$325	21.4	\$6,955.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$240	18.8	\$4,512.00
Carmen Turner	Project Assistant – Joined firm in 2021	\$200	65.4	\$13,080.00
	Totals		750.5	\$537,525.50
	Attorney Blended Rate	\$816.83		
	Paraprofessional Blended Rate	\$275.59		

Exhibit C

Summary of Expenses Incurred and Paid

SUMMARY OF EXPENSES INCURRED AND PAID

DESCRIPTION	Total Expenses for Period
Contracted Professional Services – Litigation Support Vendor	\$3,551.32
Depositions / Transcripts	\$1,415.20
Travel – Train Fare	\$370.00
Travel – Parking	\$48.00
Travel – Lodging	\$550.00
Travel – Meals	\$100.78
Total	\$6,035.30

Exhibit D
Time and Expense Detail

GILBERT LLP

700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
O 202.772.2200
F 202.772.3333
GilbertLegal.com

Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

August 19, 2022
Invoice Number: 11327473
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through June 30, 2022

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	537,525.50	6,035.30	543,560.80
Total	537,525.50	6,035.30	543,560.80

TOTAL FEES \$ 537,525.50

TOTAL EXPENSES \$ 6,035.30

TOTAL FEES AND EXPENSES \$ 543,560.80

FOR PROFESSIONAL SERVICES RENDERED through June 30, 2022

Purdue Bankruptcy

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	6/01/22	Review court docket for recently filed insurance-related pleadings.	.50	100.00
Turner, C.	6/06/22	Review court docket re insurance-related pleadings recently filed in case.	.80	160.00
Turner, C.	6/13/22	Review court docket re insurance-related pleadings recently filed.	.70	140.00
Turner, C.	6/21/22	Review court docket for recently filed insurance-related pleadings.	.60	120.00
Turner, C.	6/28/22	Review court docket for recently filed pleadings in case.	.70	140.00
Project Total:			3.30	\$ 660.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	6/07/22	Confer with AHC re strategy.	.50	900.00
Quinn, K.	6/08/22	Participate in call with AHC re strategy.	1.00	1,250.00
Gilbert, S.	6/28/22	Confer with AHC re strategy.	.50	900.00
Project Total:			2.00	\$ 3,050.00

A015: Non-Working Travel (Billed @ 50%)

Name	Date	Services	Hours	Amount
Rubinstein, J.	6/14/22	Travel from New York, NY to Washington, DC after R. O'Connor deposition.	4.80	2,040.00
Project Total:			4.80	\$ 2,040.00

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	6/28/22	Confer with K. Eckstein re strategy.	.50	900.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Gilbert, S.	6/29/22	Review and revise Kramer Levin memorandum re strategy.	1.00	1,800.00
Project Total:			1.50	\$ 2,700.00

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	6/01/22	Confer with R. Leveridge and J. Rubinstein re status, strategy, next steps (1.4); confer with S. Sraders and J. Hudson re Issue #34 (0.7); confer with A. Gaske and J. Rubinstein re policy stipulation issues (0.9); analyze other litigation issues (1.0).	4.00	5,800.00
Hudson, J.	6/01/22	Confer with R. Shore and S. Sraders re Issue #34.	.70	549.50
Girgenti, J.	6/01/22	Review and identify documents re Marsh deposition preparation.	5.20	1,898.00
Rubinstein, J.	6/01/22	Confer with R. Leveridge and R. Shore re strategy and significant tasks (1.4); confer with A. Gaske and R. Shore re policy stipulation project (0.9); analysis of documents and related preparation re Marsh depositions (4.0); revise draft template Rule 30(b)(6) deposition notice (0.7); confer with R. Leveridge re strategy (0.5); communicate with S. Sraders re expert analysis (0.2).	7.70	6,545.00
Rush, M.	6/01/22	Review relevant documents in preparation for Marsh depositions (3.9); draft summary of key documents (2.1).	6.00	4,200.00
Martinez, S.	6/01/22	Confer with A. Gaske, A. Bonesteel, and B. Hubbard re policy database master document.	1.40	455.00
Bonesteel, A.	6/01/22	Confer with A. Gaske, S. Martinez and B. Hubbard re upcoming policy review.	1.40	525.00
Gaske, A.	6/01/22	Confer with J. Rubinstein and R. Shore re policy comparison for Insurers #18, #19, and #20.	.90	549.00
Gaske, A.	6/01/22	Confer with A. Bonesteel, B. Hubbard, and S. Martinez re policy review issues.	1.40	854.00
Gaske, A.	6/01/22	Revise Rule 30(b)(6) deposition topics pursuant to J. Rubinstein edits.	1.50	915.00
Gaske, A.	6/01/22	Analyze policy review strategy and process.	2.20	1,342.00
Leveridge, R.	6/01/22	Confer with R. Shore and J. Rubinstein re strategy of litigation, discovery, and experts (1.4); communications with co-counsel re same (0.8); confer with J. Rubinstein re deposition strategy (0.5).	2.70	3,915.00
Sraders, S.	6/01/22	Confer with J. Hudson and R. Shore re Issue #34.	.70	462.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	6/01/22	Draft search terms for review of Debtors' documents.	2.70	1,782.00
Hubbard, B.	6/01/22	Review materials re prior policy language reviews (0.7); consolidate prior policy language reviews to create one data source for all insurance policy related information (1.8); confer with A. Gaske, A. Bonesteel and S. Martinez re policy review (1.4); analyze new system for the purposes of maintaining insurance policy information (0.5).	4.40	1,870.00
Huddleston, D.	6/01/22	Communicate with S. Sraders re Issue #34 research.	.10	42.00
Shore, R.	6/02/22	Confer with potential expert re retention re consulting / expert role (0.5); confer with J. Rubinstein re deposition strategy (0.6); review Marsh documents in preparation for deposition (0.8); analysis of discovery issues for call with insurers (0.8); analyze other litigation issues (0.3).	3.00	4,350.00
Rubinstein, J.	6/02/22	Analysis of Marsh deposition documents (6.4); confer with co-counsel re same (0.6); confer with co-counsel re Debtors' Rule 30(b)(6) issues (0.8); confer with R. Shore re strategy (0.6); correspond with A. Gaske re policy stipulation question (0.1); analysis re retention of expert (0.3).	8.80	7,480.00
Sanchez, J.	6/02/22	Confer with S. Sraders and D. Huddleston re Issue #34 research.	.50	237.50
Rush, M.	6/02/22	Continue reviewing relevant documents in preparation for Marsh depositions.	3.90	2,730.00
Rush, M.	6/02/22	Draft summary of relevant documents for Marsh depositions.	1.80	1,260.00
Rush, M.	6/02/22	Draft deposition outline.	.30	210.00
Rush, M.	6/02/22	Communicate with co-counsel re Debtors' depositions.	.30	210.00
Rush, M.	6/02/22	Confer with L. Szymanski re key issues and topics for Marsh deposition.	1.70	1,190.00
Rush, M.	6/02/22	Confer with co-counsel re deposition strategy.	.80	560.00
Bonesteel, A.	6/02/22	Confer with Relativity vendor re upcoming transcript review.	.50	187.50
Gaske, A.	6/02/22	Confer with C. Turner re policy comparison project.	.40	244.00
Gaske, A.	6/02/22	Revise policy comparison spreadsheet for Insurers #18, #19, and #20.	3.30	2,013.00
Gaske, A.	6/02/22	Draft Rule 30(b)(6) deposition topics to include instructions and definitions.	2.40	1,464.00
Leveridge, R.	6/02/22	Confer with co-counsel re discovery and experts (0.8); analyze discovery issues (1.5).	2.30	3,335.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	6/02/22	Confer with J. Sanchez and D. Huddleston re Issue #34 research.	.50	330.00
Sraders, S.	6/02/22	Review policy language re Issue #34.	1.80	1,188.00
Turner, C.	6/02/22	Review and organize third-party subpoenas.	.40	80.00
Turner, C.	6/02/22	Confer with A. Gaske re policy stipulation review.	.40	80.00
Turner, C.	6/02/22	Review Insurers #18, #19, and #20 policies in conjunction with policy stipulation project.	2.10	420.00
Hubbard, B.	6/02/22	Review and document consolidated insurance policy provision and language information.	.80	340.00
Huddleston, D.	6/02/22	Confer with S. Sraders and J. Sanchez re Issue #34.	.50	210.00
Shore, R.	6/03/22	Analysis of policy review for stipulation project (0.5); confer with J. Rubinstein and A. Gaske re same (0.5).	1.00	1,450.00
Rubinstein, J.	6/03/22	Confer with A. Gaske and R. Shore re policy stipulation analysis (0.5); review documents re same (1.3); review materials and strategy in preparation for Marsh deposition (3.4); analysis re potential deposition protocol (0.2); confer with co-plaintiffs' and defense counsel re Debtors' Rule 30(b)(6) notice and deposition logistics (0.6); communicate with team re offensive depositions (0.2).	6.20	5,270.00
Rush, M.	6/03/22	Review deposition protocol.	.70	490.00
Rush, M.	6/03/22	Confer with L. Szymanski and J. Rubinstein re key issues / topics for Marsh deposition.	.60	420.00
Rush, M.	6/03/22	Confer with insurers re depositions (0.5); communicate with J. Rubinstein re same (0.2).	.70	490.00
Rush, M.	6/03/22	Communicate with R. Leveridge, J. Rubinstein and A. Gaske re deposition notices.	1.00	700.00
Gaske, A.	6/03/22	Revise Rule 30(b)(6) notice re definitions and instructions.	2.10	1,281.00
Gaske, A.	6/03/22	Confer with J. Rubinstein and R. Shore re policy stipulation project.	.50	305.00
Gaske, A.	6/03/22	Complete analysis of policy comparison for Insurers #18, #19, and #20 re policy stipulations.	2.20	1,342.00
Turner, C.	6/03/22	Finalize review of Insurers #18, #19, and #20 policies re policy stipulation project.	1.20	240.00
Leveridge, R.	6/04/22	Communicate with team re strategy and litigation planning.	1.40	2,030.00
Rush, M.	6/05/22	Analysis of issues for Marsh deposition.	1.50	1,050.00
Leveridge, R.	6/05/22	Communicate with team re discovery issues.	.40	580.00
Shore, R.	6/06/22	Review issues in preparation for depositions.	1.00	1,450.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Hudson, J.	6/06/22	Review correspondence from Insurer #22.	.20	157.00
Rubinstein, J.	6/06/22	Analysis re offensive case.	2.40	2,040.00
Rush, M.	6/06/22	Continue analysis of issues for Marsh deposition.	1.10	770.00
Martinez, S.	6/06/22	Review policies re certain language.	.30	97.50
Martinez, S.	6/06/22	Confer with S. Ogrey, S. Sraders and C. Turner re review of policies for certain language.	.60	195.00
Bonesteel, A.	6/06/22	Review transcript application (0.3); confer with Relativity re upcoming transcript review (0.3).	.60	225.00
Gaske, A.	6/06/22	Communicate with team re review of certain policy provisions.	.20	122.00
Leveridge, R.	6/06/22	Review materials re deposition preparation and discovery (1.0); communications with co-counsel re same (0.4); communications with opposing counsel re discovery (0.4).	1.80	2,610.00
Leveridge, R.	6/06/22	Communicate with team re potential experts.	.30	435.00
Ogrey, S.	6/06/22	Confer with S. Martinez, C. Turner, and S. Sraders re policy language review.	.60	144.00
Ogrey, S.	6/06/22	Continue to review policies for certain language.	.80	192.00
Sraders, S.	6/06/22	Confer with S. Martinez, S. Ogrey, and C. Turner re review of policies re Issue #34.	.60	396.00
Sraders, S.	6/06/22	Research re potential experts.	1.80	1,188.00
Turner, C.	6/06/22	Review policies for Issue #34 language.	2.70	540.00
Turner, C.	6/06/22	Confer with S. Sraders, S. Martinez, and S. Ogrey re policy review.	.60	120.00
Shore, R.	6/07/22	Analyze discovery status and strategy (1.0); correspond with R. Leveridge and J. Rubinstein re upcoming depositions (0.1).	1.10	1,595.00
Rubinstein, J.	6/07/22	Review materials and issues in preparation for upcoming deposition (4.8); analysis re expert retention (0.1); review status of policy stipulation project analysis (1.0); communicate with co-plaintiffs re same (0.2); communicate with Debtors' counsel re Rule 30(b)(6) deposition scheduling (0.1); communicate with R. Leveridge and R. Shore re same (0.1); communicate with potential expert (0.2); analysis re insurance portfolio (0.8).	7.30	6,205.00
Sanchez, J.	6/07/22	Research Issue #34.	2.60	1,235.00
Rush, M.	6/07/22	Continue analysis of issues in preparation for Marsh deposition.	1.50	1,050.00
Rush, M.	6/07/22	Research case developments re Issue #14.	.50	350.00
Rush, M.	6/07/22	Draft outline for insurer depositions.	3.70	2,590.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Martinez, S.	6/07/22	Review and organize materials in preparation of upcoming R. O'Connor/Marsh deposition.	.80	260.00
Martinez, S.	6/07/22	Revise chart re certain language per policy review (1.3); confer with S. Sraders and C. Turner re same (0.3).	1.60	520.00
Gaske, A.	6/07/22	Finalize policy comparison spreadsheets for all insurers in adversary proceeding (1.9); communicate with insurer counsel re same (0.4).	2.30	1,403.00
Leveridge, R.	6/07/22	Review communications from co-counsel re discovery (0.5); review communications from opposing counsel re same (0.4).	.90	1,305.00
Ogrey, S.	6/07/22	Continue to review policies for certain language.	.30	72.00
Sraders, S.	6/07/22	Confer with J. Rubinstein re upcoming R. O'Connor deposition.	.20	132.00
Sraders, S.	6/07/22	Analyze expert reports and other evidence.	2.20	1,452.00
Sraders, S.	6/07/22	Confer with S. Martinez and C. Turner re review of policies re Issue #34.	.30	198.00
Turner, C.	6/07/22	Continue review of policies for certain language.	9.10	1,820.00
Turner, C.	6/07/22	Confer with S. Martinez and S. Sraders re policy review.	.30	60.00
Shore, R.	6/08/22	Communicate with J. Rubinstein re discovery and strategy issues (0.3); participate in call with co-counsel re deposition preparation (2.2); review Rule 30(b)(6) notice (2.0).	4.50	6,525.00
Hudson, J.	6/08/22	Confer with Debtors' counsel (A. Kramer) re status of claims submission to Insurer #22.	.10	78.50
Hudson, J.	6/08/22	Review materials for upcoming deposition.	.30	235.50
Rubinstein, J.	6/08/22	Review various materials in preparation for upcoming depositions (4.1); revise deposition protocol (0.9); communications with Debtors' counsel re Debtors' Rule 30(b)(6) deposition (0.1); communicate with J. Hudson re Debtors' insurance portfolios (0.3); correspond with team re expert reports (0.3).	5.70	4,845.00
Sanchez, J.	6/08/22	Continue researching Issue #34.	2.20	1,045.00
Rush, M.	6/08/22	Continue drafting deposition outline.	5.20	3,640.00
Rush, M.	6/08/22	Confer with co-counsel re Marsh depositions.	2.20	1,540.00
Rush, M.	6/08/22	Review deposition protocol.	.80	560.00
Martinez, S.	6/08/22	Finalize review and organization of materials in preparation for upcoming R. O'Connor/Marsh deposition.	.40	130.00
Martinez, S.	6/08/22	Review production databases re Insurers #15 and #27 privilege log of October 8, 2021 production.	.20	65.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Martinez, S.	6/08/22	Continue revising chart re language found in policy review.	3.00	975.00
Ogrey, S.	6/08/22	Review certain language in policies listed in complaint.	3.00	720.00
Sraders, S.	6/08/22	Confer with counsel for co-counsel re upcoming deposition.	2.20	1,452.00
Sraders, S.	6/08/22	Communicate with J. Rubinstein and M. Rush re upcoming deposition of R. O'Connor.	.20	132.00
Sraders, S.	6/08/22	Analyze status of policy review re Issue #34.	.60	396.00
Turner, C.	6/08/22	Continue to review policies for certain language.	8.10	1,620.00
Shore, R.	6/09/22	Review and comment on Rule 30(b)(6) deposition notice (3.2); confer with team re status (0.6).	3.80	5,510.00
Hudson, J.	6/09/22	Confer with team re case status.	.60	471.00
Girgenti, J.	6/09/22	Confer with team re litigation update.	.60	219.00
Rubinstein, J.	6/09/22	Update litigation task list (0.8); communicate with co-plaintiffs' counsel re deposition preparation (0.3); analysis re potential experts (0.4); confer with M. Rush re discovery projects (0.4); review status of compilation of materials re R. O'Connor deposition (0.4); confer with team re strategy / progress (0.6); analysis re expert reports (0.9); continue preparing for deposition (2.1); revise current version of deposition protocol (0.8).	6.70	5,695.00
Sanchez, J.	6/09/22	Confer with team re status and strategy.	.60	285.00
Rush, M.	6/09/22	Communicate with insurers re discovery issues.	.20	140.00
Rush, M.	6/09/22	Analysis of discovery status and related issues.	.60	420.00
Rush, M.	6/09/22	Communicate with co-counsel re document review.	.60	420.00
Rush, M.	6/09/22	Confer with team re case status and strategy.	.60	420.00
Martinez, S.	6/09/22	Finalize R. O'Connor / Marsh deposition materials.	.30	97.50
Martinez, S.	6/09/22	Review and finalize revisions to policy language chart.	1.40	455.00
Martinez, S.	6/09/22	Confer with team re case status and strategy.	.60	195.00
Bonesteel, A.	6/09/22	Confer with team re case status and strategy.	.60	225.00
Bonesteel, A.	6/09/22	Create search for attorney review of Debtors' records.	.70	262.50
Ogrey, S.	6/09/22	Review and organize materials for R. O'Connor deposition.	.30	72.00
Ogrey, S.	6/09/22	Revise chart re review of policies for certain language.	.80	192.00
Ogrey, S.	6/09/22	Confer with team re case status and strategy.	.60	144.00
Sraders, S.	6/09/22	Research re Issue #34.	1.30	858.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	6/09/22	Confer with team re recent developments and anticipated next steps.	.60	396.00
Sraders, S.	6/09/22	Correspond with J. Rubinstein re expert reports.	.60	396.00
Kaminsky, E.	6/09/22	Confer with team re case status and strategy.	.60	336.00
Turner, C.	6/09/22	Confer with team re case update.	.60	120.00
Turner, C.	6/09/22	Continue review of policies for certain language.	7.00	1,400.00
Hubbard, B.	6/09/22	Confer with team re status and strategy.	.60	255.00
Hubbard, B.	6/09/22	Review and prepare documentation of Debtors' policy insurance information.	2.70	1,147.50
Huddleston, D.	6/09/22	Confer with team re case status and strategy.	.60	252.00
Agwu, I.	6/09/22	Confer with team re litigation update.	.60	252.00
Shore, R.	6/10/22	Confer with S. Sraders and J. Hudson re Issues #34 and #63 (0.9); analysis re same (1.3); analysis of discovery/expert issues (0.8); confer with J. Rubinstein re strategy (0.3).	3.30	4,785.00
Hudson, J.	6/10/22	Confer with R. Shore and S. Sraders re Issues #34 and #63 strategy.	.90	706.50
Rubinstein, J.	6/10/22	Review edits to deposition protocol (0.4); participate in call with co-plaintiffs re same (0.8); review analysis of expert reports and potential retention of same (0.3); review materials and strategy in preparation for defensive depositions (3.3); review materials and strategy in preparation for offensive depositions (2.5); confer with R. Shore re strategy (0.3).	7.60	6,460.00
Sanchez, J.	6/10/22	Research federal rules of evidence.	2.10	997.50
Rush, M.	6/10/22	Continue reviewing key documents in preparation for Marsh depositions.	1.30	910.00
Rush, M.	6/10/22	Confer with L. Szymanski, A. Crawford, J. Rubinstein and S. Sraders re deposition protocol.	.80	560.00
Rush, M.	6/10/22	Communicate with S. Sraders and I. Agwu re document review.	.60	420.00
Rush, M.	6/10/22	Review draft Rule 30(b)(6) notice.	.70	490.00
Martinez, S.	6/10/22	Review and organize potential R. O'Connor deposition exhibit materials.	1.80	585.00
Martinez, S.	6/10/22	Communicate with S. Sraders, C. Turner, and S. Ogrey re continuation of policy language review project.	.20	65.00
Ogrey, S.	6/10/22	Continue to review policies for certain language.	5.10	1,224.00
Sraders, S.	6/10/22	Confer with R. Shore and J. Hudson re analysis of Issue #34.	.90	594.00
Sraders, S.	6/10/22	Research re Issue #34.	1.80	1,188.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	6/10/22	Confer with L. Szymanski, A. Crawford, J. Rubinstein and M. Rush re review of Debtors' documents.	.80	528.00
Sraders, S.	6/10/22	Review and analyze proposed search terms for review of Debtors' documents.	.50	330.00
Turner, C.	6/10/22	Continue review of policies re certain language.	5.80	1,160.00
Turner, C.	6/10/22	Calendar Rule 30(b)(6) deposition re topics 1-6.	.30	60.00
Agwu, I.	6/10/22	Review Debtors' productions in preparation for upcoming depositions.	3.50	1,470.00
Rubinstein, J.	6/12/22	Review discovery materials in preparation for offensive depositions.	1.70	1,445.00
Shore, R.	6/13/22	Review and comment on interrogatories and documents requests (4.7); confer with R. Leveridge re various litigation issues (0.2).	4.90	7,105.00
Hudson, J.	6/13/22	Analyze next steps for Insurer #22.	.20	157.00
Rubinstein, J.	6/13/22	Continue reviewing materials and strategy in preparation for upcoming deposition (2.5); continue same while traveling to New York, NY to attend R. O'Connor deposition (4.5); confer with R. Leveridge re projects and strategy (0.3); confer with co-plaintiffs' counsel re document review analysis (0.6); analysis re Debtors' Rule 30(b)(6) preparation (0.8); confer with team re case status and strategy (0.2).	8.90	7,565.00
Sanchez, J.	6/13/22	Continue researching state rules of evidence.	2.90	1,377.50
Rush, M.	6/13/22	Confer with Reed Smith, Cobra (vendor), J. Rubinstein, and S. Sraders re document review process.	.60	420.00
Rush, M.	6/13/22	Confer with team re discovery strategy.	.20	140.00
Martinez, S.	6/13/22	Finalize review and organization of potential R. O'Connor deposition exhibit materials.	4.00	1,300.00
Bonesteel, A.	6/13/22	Perform searches for relevant documents in production database.	1.30	487.50
Leveridge, R.	6/13/22	Confer with co-counsel re discovery issues (0.6); confer with J. Rubinstein re upcoming depositions (0.3); review material re same (0.8); confer with team re strategy (0.2).	1.90	2,755.00
Leveridge, R.	6/13/22	Communicate with potential experts (0.3); review material re same (0.4).	.70	1,015.00
Sraders, S.	6/13/22	Confer with Reed Smith, Cobra (database vendor), J. Rubinstein, and M. Rush re review of documents.	.60	396.00
Sraders, S.	6/13/22	Review insurer productions to determine domain names for additional searches.	1.50	990.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Kaminsky, E.	6/13/22	Confer with team re strategy.	.20	112.00
Turner, C.	6/13/22	Continue reviewing policies re certain language.	3.30	660.00
Turner, C.	6/13/22	Review and organize potential exhibits for R. O'Connor deposition.	3.30	660.00
Agwu, I.	6/13/22	Continue review of productions in preparation for upcoming depositions.	4.00	1,680.00
Agwu, I.	6/13/22	Research evidentiary issues.	3.50	1,470.00
Shore, R.	6/14/22	Attend O'Connor deposition (via video link) (5.0); confer with co-counsel re same (0.5).	5.50	7,975.00
Rubinstein, J.	6/14/22	Review materials in preparation for R. O'Connor deposition (2.5); attend R. O'Connor deposition (7.5).	10.00	8,500.00
Sanchez, J.	6/14/22	Review Debtors' document discovery.	3.90	1,852.50
Sanchez, J.	6/14/22	Continue researching state rules of evidence.	1.30	617.50
Rush, M.	6/14/22	Attend R. O'Connor deposition (via video link).	7.50	5,250.00
Leveridge, R.	6/14/22	Communicate with co-counsel re deposition (0.5); communicate with team re same (0.4).	.90	1,305.00
Sraders, S.	6/14/22	Research re Issue #34.	1.20	792.00
Sraders, S.	6/14/22	Attend (remote) deposition for R. O'Connor.	7.50	4,950.00
Turner, C.	6/14/22	Continue reviewing policies for certain language.	6.90	1,380.00
Agwu, I.	6/14/22	Review Debtors' expert document production in preparation for upcoming depositions.	4.00	1,680.00
Agwu, I.	6/14/22	Continue researching rules of evidence.	4.00	1,680.00
Shore, R.	6/15/22	Confer with consultant, R. Leveridge, J. Rubinstein, and B. Hubbard re analysis.	1.90	2,755.00
Rubinstein, J.	6/15/22	Confer with M. Rush and R. Leveridge re offensive case strategy (1.5); analysis re potential experts (0.5); confer with consultant, R. Leveridge, R. Shore and B. Hubbard re analysis (1.9); revise response letter to National Union (0.9); revise proposed expert retention (0.4); begin drafting trial plan (0.5).	5.70	4,845.00
Sanchez, J.	6/15/22	Research rules of evidence.	2.80	1,330.00
Rush, M.	6/15/22	Communications with co-counsel re discovery issues.	.40	280.00
Rush, M.	6/15/22	Confer with R. Leveridge and J. Rubinstein re litigation strategy.	1.50	1,050.00
Martinez, S.	6/15/22	Communicate with J. Rubinstein re researching potential experts.	.20	65.00
Martinez, S.	6/15/22	Research re potential experts.	.60	195.00
Leveridge, R.	6/15/22	Confer with J. Rubinstein and M. Rush re trial planning.	1.50	2,175.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	6/15/22	Review draft response by co-counsel to discovery letter form opposing counsel.	.90	1,305.00
Leveridge, R.	6/15/22	Review material from co-counsel re Rule 30(b)(6) deposition.	1.20	1,740.00
Leveridge, R.	6/15/22	Confer with expert re analysis.	1.90	2,755.00
Ogrey, S.	6/15/22	Continue to review policies for certain language.	2.40	576.00
Sraders, S.	6/15/22	Research re Issue #34.	3.00	1,980.00
Sraders, S.	6/15/22	Review documents for insurer domain names for searches.	.90	594.00
Sraders, S.	6/15/22	Communicate with various experts re potential involvement in case.	.80	528.00
Sraders, S.	6/15/22	Analyze research and materials re experts.	1.20	792.00
Turner, C.	6/15/22	Finalize review of policies for certain language.	3.40	680.00
Hubbard, B.	6/15/22	Confer with potential expert, R. Leveridge, R. Shore, and J. Rubinstein re analyses.	1.90	807.50
Huddleston, D.	6/15/22	Review Debtors' document production of expert reports.	2.00	840.00
Agwu, I.	6/15/22	Complete tracking sheet for Debtors' expert documents.	1.50	630.00
Agwu, I.	6/15/22	Research evidence issues.	4.00	1,680.00
Shore, R.	6/16/22	Confer with co-plaintiffs re discovery issues (1.1); confer with team re strategy (1.1); analysis re Rule 30(b)(6) preparation (2.7); confer with M. Rush re Rule 30(b)(6) notice (0.6).	5.50	7,975.00
Hudson, J.	6/16/22	Review summary of case law on Issues #34 and #63.	.10	78.50
Hudson, J.	6/16/22	Confer with team re litigation status.	1.10	863.50
Girgenti, J.	6/16/22	Confer with team re litigation update.	1.10	401.50
Rubinstein, J.	6/16/22	Revise discovery letter to National Union (0.8); confer with co-plaintiffs re same (1.1); update litigation task list (0.9); confer with team re strategy (1.1); continue outlining draft trial plan (0.5); review draft preparation materials re Debtors' Rule 30(b)(6) deposition (0.3).	4.70	3,995.00
Sanchez, J.	6/16/22	Review discovery produced in underlying litigation.	.20	95.00
Sanchez, J.	6/16/22	Confer with team re status of litigation and discovery.	1.10	522.50
Sanchez, J.	6/16/22	Research bankruptcy rules of evidence.	2.10	997.50
Rush, M.	6/16/22	Confer with R. Shore re Rule 30(b)(6) notice.	.60	420.00
Rush, M.	6/16/22	Review case law summary re deposition issues.	1.10	770.00
Rush, M.	6/16/22	Confer with co-counsel re response to discovery letter from insurers.	1.10	770.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Rush, M.	6/16/22	Confer with team re case status and strategy.	1.10	770.00
Rush, M.	6/16/22	Revise Rule 30(b)(6) notice.	.70	490.00
Martinez, S.	6/16/22	Confer with team re case status and strategy.	1.10	357.50
Bonesteel, A.	6/16/22	Confer with team re case strategy.	1.10	412.50
Leveridge, R.	6/16/22	Review communications from co-counsel re discovery issues (0.3); confer with co-counsel re same (1.1).	1.40	2,030.00
Leveridge, R.	6/16/22	Confer with team re litigation status.	1.10	1,595.00
Ogrey, S.	6/16/22	Review Issues #14 and #27 briefs re citations.	.80	192.00
Ogrey, S.	6/16/22	Confer with team re case update.	1.10	264.00
Sraders, S.	6/16/22	Confer with team re strategy and proposed next steps.	1.10	726.00
Sraders, S.	6/16/22	Correspond with experts re potential engagement.	.30	198.00
Sraders, S.	6/16/22	Communicate with I. Agwu re review of underlying expert reports.	.40	264.00
Sraders, S.	6/16/22	Confer with D. Huddleston re research re Issue #34.	.20	132.00
Kaminsky, E.	6/16/22	Confer with team case status.	1.10	616.00
Hubbard, B.	6/16/22	Analyze status of insurance policy language review and data loading (0.6); prepare materials for expert analysis (0.5).	1.10	467.50
Hubbard, B.	6/16/22	Confer with team re status and strategy.	1.10	467.50
Huddleston, D.	6/16/22	Confer with S. Sraders re Issue #34.	.20	84.00
Huddleston, D.	6/16/22	Confer with team re case strategy and update.	1.10	462.00
Agwu, I.	6/16/22	Confer with team re litigation status.	1.10	462.00
Agwu, I.	6/16/22	Review expert reports (2.1); draft summary of relevant findings (1.9).	4.00	1,680.00
Shore, R.	6/17/22	Review and provide comments on Rule 30(b)(6) deposition materials (1.0); confer with co-counsel re same (1.0).	2.00	2,900.00
Rubinstein, J.	6/17/22	Analysis re Debtors' Rule 30(b)(6) deposition (0.3); confer with co-plaintiffs re same (1.0); confer with R. Leveridge re multiple tasks and strategy (0.5); analysis re defensive depositions (0.4); confer with team re review of potentially relevant documents (1.0); communicate with D. Huddleston re research project (0.2); review edits to offensive deposition notice (0.3); analysis re expert reports (0.5).	4.20	3,570.00
Sanchez, J.	6/17/22	Confer with J. Rubinstein, M. Rush, S. Sraders, and D. Huddleston re deposition preparation.	1.00	475.00
Rush, M.	6/17/22	Revise Rule 30(b)(6) notice.	1.00	700.00
Rush, M.	6/17/22	Begin drafting outline re Rule 30(b)(6) depositions.	1.20	840.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Rush, M.	6/17/22	Confer with co-counsel re deposition strategy.	1.00	700.00
Rush, M.	6/17/22	Confer with J. Rubinstein, S. Sraders, J. Sanchez and D. Huddleston re document review process.	1.00	700.00
Leveridge, R.	6/17/22	Confer with co-counsel re claims analysis, discovery issues and litigation strategy (1.0); confer with J. Rubinstein re litigation strategy (0.5).	1.50	2,175.00
Ogrey, S.	6/17/22	Review and organize subpoena issued to R. O'Connor.	.40	96.00
Ogrey, S.	6/17/22	Review draft briefs re Issues #14 and #27 for citations.	.50	120.00
Sraders, S.	6/17/22	Confer with J. Rubinstein, M. Rush, J. Sanchez and D. Huddleston re document review in preparation for Marsh depositions.	1.00	660.00
Sraders, S.	6/17/22	Analysis re Debtors' policy productions.	.60	396.00
Sraders, S.	6/17/22	Research re Issue #1.	.60	396.00
Kaminsky, E.	6/17/22	Research case law on evidence re discovery.	1.10	616.00
Hubbard, B.	6/17/22	Review general status and strategy for maintenance of insurance policy data and documents.	1.00	425.00
Huddleston, D.	6/17/22	Confer with J. Rubinstein, M. Rush, S. Sraders and J. Sanchez re document review strategy.	1.00	420.00
Agwu, I.	6/17/22	Draft summary of expert's relevant analysis.	1.50	630.00
Agwu, I.	6/17/22	Review W. Chang documents in preparation for upcoming deposition.	2.60	1,092.00
Leveridge, R.	6/18/22	Communicate with co-counsel re claims analysis.	.40	580.00
Sraders, S.	6/19/22	Research re Issue #34.	1.50	990.00
Shore, R.	6/20/22	Confer with R. Leveridge and J. Rubinstein re status, strategy, and next steps.	1.20	1,740.00
Rubinstein, J.	6/20/22	Review correspondence from co-plaintiff counsel re preparation re Debtors' Rule 30(b)(6) deposition re insurance topics (0.2); confer with R. Shore and R. Leveridge re strategy (1.2); communicate with team re review projects (0.4).	1.80	1,530.00
Leveridge, R.	6/20/22	Confer with R. Shore and J. Rubinstein re litigation strategy, proof of case and related topics.	1.20	1,740.00
Leveridge, R.	6/20/22	Communicate with co-counsel re claim analysis.	.60	870.00
Sraders, S.	6/20/22	Analyze insurer productions in preparation for upcoming depositions.	1.60	1,056.00
Hubbard, B.	6/20/22	Analyze data and information sources.	.80	340.00
Agwu, I.	6/20/22	Continue reviewing W. Chang documents in preparation for upcoming deposition.	3.00	1,260.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Shore, R.	6/21/22	Confer with co-plaintiff counsel re claim analysis for Rule 30(b)(6) deposition (1.4); communicate with R. Leveridge re same (0.4); analysis re Rule 30(b)(6) deposition (3.3); review and revise note to client re consultant retention (0.4).	5.50	7,975.00
Girgenti, J.	6/21/22	Review and identify documents for upcoming depositions.	6.90	2,518.50
Rubinstein, J.	6/21/22	Revise correspondence to client re expert retentions (0.4); communicate with Debtors' counsel re deposition preparation (0.2); analysis re Issue #34 (0.6); confer with R. Shore and R. Leveridge re same (1.1); confer with co-plaintiff counsel re review of various collections of documents in preparation for depositions (0.7); confer with co-plaintiff counsel re strategy re Debtors' Rule 30(b)(6) preparation (0.9); confer with potential expert (1.7); revise draft deposition notice to insurers (0.8).	6.40	5,440.00
Sanchez, J.	6/21/22	Review documents in preparation for defensive depositions.	.80	380.00
Rush, M.	6/21/22	Revise Rule 30(b)(6) outline and notice.	3.30	2,310.00
Rush, M.	6/21/22	Confer with L. Szymanski and J. Rubinstein re depositions and document review.	1.10	770.00
Rush, M.	6/21/22	Confer with co-counsel re complaints/proofs of claim.	1.40	980.00
Rush, M.	6/21/22	Continue drafting deposition outline.	.60	420.00
Leveridge, R.	6/21/22	Confer with co-counsel re claims analyses (1.4); analysis re same (0.3).	1.70	2,465.00
Leveridge, R.	6/21/22	Confer with potential expert (0.7); review materials re same (0.6).	1.30	1,885.00
Leveridge, R.	6/21/22	Draft communication to client re retention of experts.	.80	1,160.00
Sraders, S.	6/21/22	Confer with L. Szymanski, A. Crawford, J. Rubinstein and M. Rush re review of documents for upcoming depositions.	.60	396.00
Sraders, S.	6/21/22	Confer with J. Rubinstein and R. Leveridge re experts.	.30	198.00
Sraders, S.	6/21/22	Continue research re Issue #34.	1.70	1,122.00
Sraders, S.	6/21/22	Research re Issue #1.	.40	264.00
Sraders, S.	6/21/22	Confer with potential expert, J. Rubinstein, and R. Leveridge.	.70	462.00
Kaminsky, E.	6/21/22	Research evidence law re discovery.	.50	280.00
Hubbard, B.	6/21/22	Consolidate data analysis (1.2); communicate with R. Leveridge and J. Rubinstein re same (0.5).	1.70	722.50

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Agwu, I.	6/21/22	Continue review of W. Chang documents in preparation for upcoming deposition.	1.50	630.00
Shore, R.	6/22/22	Confer with R. Leveridge, J. Rubinstein, and M. Rush re Rule 30(b)(6) notice (2.0); review note re consultant/expert retention (0.2).	2.20	3,190.00
Girgenti, J.	6/22/22	Review and identify key documents for upcoming deposition.	6.50	2,372.50
Rubinstein, J.	6/22/22	Revise draft Rule 30(b)(6) notice (0.3); confer with R. Shore, R. Leveridge and M. Rush re same (2.0); analysis re case projects (0.5); communicate with team re various document review projects (0.5); correspond with A. Gaske re policy stipulation project (0.2); preparation re Debtors' Rule 30(b)(6) deposition and correspondence with co-counsel re same (0.6); confer with R. Leveridge, M. Rush, A. Gaske and S. Sraders re offensive depositions (1.2); correspond with potential expert (0.2); provide comments on draft deposition notice (0.2).	5.70	4,845.00
Sanchez, J.	6/22/22	Review documents in preparation for defensive depositions.	2.70	1,282.50
Rush, M.	6/22/22	Communicate with team re status of document review.	.40	280.00
Rush, M.	6/22/22	Confer with co-counsel re document review process.	.90	630.00
Rush, M.	6/22/22	Confer with R. Shore, R. Leveridge, and J. Rubinstein re Rule 30(b)(6) notice.	2.00	1,400.00
Rush, M.	6/22/22	Revise Rule 30(b)(6) notice.	.60	420.00
Rush, M.	6/22/22	Review relevant documents in preparation for upcoming deposition.	2.30	1,610.00
Rush, M.	6/22/22	Confer with R. Leveridge, J. Rubinstein, A. Gaske and S. Sraders re insurer depositions.	1.20	840.00
Gaske, A.	6/22/22	Confer with R. Leveridge, J. Rubinstein, M. Rush, and S. Sraders re offensive discovery strategy.	1.20	732.00
Gaske, A.	6/22/22	Draft policy stipulation for Insurer #25.	.40	244.00
Leveridge, R.	6/22/22	Confer with R. Shore, J. Rubinstein and M. Rush re Rule 30(b)(6) notice.	2.00	2,900.00
Leveridge, R.	6/22/22	Communicate with co-counsel re claims analyses.	.80	1,160.00
Leveridge, R.	6/22/22	Confer with J. Rubinstein, M. Rush, A. Gaske and S. Sraders with team re offensive depositions.	1.20	1,740.00
Leveridge, R.	6/22/22	Communicate with team re experts (0.2); review communications with potential expert (0.5).	.70	1,015.00
Sraders, S.	6/22/22	Confer with J. Rubinstein, R. Leveridge, M. Rush, and A. Gaske re upcoming depositions.	1.20	792.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	6/22/22	Communicate with J. Rubinstein re potential expert.	.10	66.00
Kaminsky, E.	6/22/22	Research evidence law re discovery.	1.60	896.00
Turner, C.	6/22/22	Review correspondence on behalf of Debtors/plaintiffs.	.70	140.00
Huddleston, D.	6/22/22	Review documents and tag for deposition-related issues.	1.10	462.00
Agwu, I.	6/22/22	Review W. Chang documents in preparation for upcoming deposition.	3.00	1,260.00
Shore, R.	6/23/22	Confer with team re case status (1.1); analyze Issue #27 (0.4).	1.50	2,175.00
Hudson, J.	6/23/22	Confer with team re litigation status.	1.10	863.50
Rubinstein, J.	6/23/22	Confer with R. Leveridge re multiple projects (0.6); correspond with team re deposition scheduling (0.3); update litigation task list (0.8); review insurer proposed edits to deposition protocol (0.3); confer with team re litigation strategy (1.1); analysis re expert reports (1.7); revise draft policy stipulation (0.7); provide comments re project associated with preparation for Debtors' Rule 30(b)(6) deposition (0.5).	6.00	5,100.00
Sanchez, J.	6/23/22	Review documents in preparation for defensive depositions.	1.60	760.00
Sanchez, J.	6/23/22	Confer with team re case status and next steps.	1.10	522.50
Rush, M.	6/23/22	Communicate with co-counsel re documents needed for deposition preparation.	.40	280.00
Rush, M.	6/23/22	Review deposition protocol.	.80	560.00
Rush, M.	6/23/22	Confer with team re case status and strategy.	1.10	770.00
Rush, M.	6/23/22	Confer with S. Sraders and A. Gaske re document review process.	.60	420.00
Rush, M.	6/23/22	Continue reviewing materials in preparation for upcoming deposition.	.50	350.00
Martinez, S.	6/23/22	Confer with team re case status and strategy.	1.10	357.50
Bonesteel, A.	6/23/22	Confer with team re ongoing case strategy.	1.10	412.50
Gaske, A.	6/23/22	Confer with litigation team re case strategy and next steps.	1.10	671.00
Gaske, A.	6/23/22	Review certain underlying claims in support of coverage theory.	.70	427.00
Gaske, A.	6/23/22	Confer with M. Rush and S. Sraders re Relativity searches for deposition preparation.	.60	366.00
Gaske, A.	6/23/22	Review insurers' revisions to deposition protocol.	.10	61.00
Gaske, A.	6/23/22	Draft remaining portions of policy stipulation for Navigators.	2.10	1,281.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	6/23/22	Review communication from insurer counsel re depositions and schedule (0.4); review insurer revised deposition protocol (0.8); confer with J. Rubinstein re discovery related issues (0.6).	1.80	2,610.00
Leveridge, R.	6/23/22	Confer with team re litigation update (1.1); review research on discovery related issues (0.3).	1.40	2,030.00
Leveridge, R.	6/23/22	Review material re claims analysis (0.6); communicate with co-counsel re same (0.5).	1.10	1,595.00
Ogrey, S.	6/23/22	Confer with team re case strategy.	1.10	264.00
Sraders, S.	6/23/22	Confer with A. Gaske and M. Rush re review of documents in Relativity.	.60	396.00
Sraders, S.	6/23/22	Confer with team re developments in case and strategy for next steps.	1.10	726.00
Kaminsky, E.	6/23/22	Confer with team re case strategy.	1.10	616.00
Kaminsky, E.	6/23/22	Research evidence law.	.90	504.00
Hubbard, B.	6/23/22	Confer with team re status and strategy.	1.10	467.50
Hubbard, B.	6/23/22	Analysis re claims data.	.80	340.00
Hubbard, B.	6/23/22	Review and organize correspondence with potential expert.	2.50	1,062.50
Huddleston, D.	6/23/22	Confer with team re case status.	1.10	462.00
Huddleston, D.	6/23/22	Draft summary of research.	.50	210.00
Huddleston, D.	6/23/22	Review and tag documents for deposition issues.	2.10	882.00
Huddleston, D.	6/23/22	Continue researching case law re discovery issues.	3.10	1,302.00
Agwu, I.	6/23/22	Confer with team re status of litigation.	1.10	462.00
Agwu, I.	6/23/22	Review personal injury complaints in preparation for upcoming deposition.	2.00	840.00
Agwu, I.	6/23/22	Continue review of W. Chang documents in preparation for upcoming deposition.	3.40	1,428.00
Shore, R.	6/24/22	Confer with R. Leveridge, J. Rubinstein and M. Rush re discovery strategy (1.0); review P. Breene email re discovery (0.3).	1.30	1,885.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Rubinstein, J.	6/24/22	Communicate with Veritext and co-plaintiff counsel re R. O'Connor transcript (0.3); review relevant bankruptcy case notice (0.1); review correspondence from insurer counsel and outline responses to same (0.5); review correspondence with multiple potential experts (0.3); review research summary re discovery issue (0.9); confer with R. Leveridge and D. Huddleston re same (0.5); communicate with document review team re review-related questions (0.3); confer with R. Leveridge, R. Shore, and M. Rush re various projects and strategy decisions (1.0); review status of document review projects (0.4); review insurer edits to deposition protocol and revise same (0.8).	5.10	4,335.00
Rush, M.	6/24/22	Draft deposition outline.	.80	560.00
Rush, M.	6/24/22	Confer with R. Shore, R. Leveridge and J. Rubinstein re depositions and discovery.	1.00	700.00
Rush, M.	6/24/22	Review Marsh documents.	3.00	2,100.00
Rush, M.	6/24/22	Review draft response to insurers re depositions and deposition protocol.	.50	350.00
Gaske, A.	6/24/22	Communicate with team re prior research on insurance issues.	.20	122.00
Gaske, A.	6/24/22	Analyze discovery responses to identify potential deponents for Insurer #33.	.50	305.00
Leveridge, R.	6/24/22	Confer with R. Shore, J. Rubinstein, and M. Rush re discovery issues and discussions with insurers (1.0); communications with Debtors' counsel re same (0.8).	1.80	2,610.00
Leveridge, R.	6/24/22	Communicate with D. Huddleston and J. Rubinstein re legal research on discovery issues (0.5); review legal research re same (0.3).	.80	1,160.00
Leveridge, R.	6/24/22	Communicate with team re expert issues (0.3); communicate with potential expert (0.3).	.60	870.00
Leveridge, R.	6/24/22	Communicate with co-counsel re claims analysis.	.30	435.00
Kaminsky, E.	6/24/22	Research evidence law re discovery.	1.00	560.00
Turner, C.	6/24/22	Review and organize R. O'Connor rough deposition transcript.	.50	100.00
Turner, C.	6/24/22	Create tracking re deposition materials.	.40	80.00
Hubbard, B.	6/24/22	Communicate with potential expert.	.40	170.00
Huddleston, D.	6/24/22	Confer with J. Rubinstein and R. Leveridge re discovery-related research.	.50	210.00
Huddleston, D.	6/24/22	Review and tag documents for deposition-related issues.	2.50	1,050.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Huddleston, D.	6/24/22	Correspond with M. Rush re instructions for deposition document review.	.20	84.00
Huddleston, D.	6/24/22	Continue reviewing case law re discovery issues.	.50	210.00
Agwu, I.	6/24/22	Review W. Chang documents in preparation for upcoming deposition.	3.00	1,260.00
Rubinstein, J.	6/26/22	Communicate with team re Debtors' Rule 30(b)(6) preparation (0.1); communicate with team re open tasks (0.4).	.50	425.00
Gaske, A.	6/26/22	Analyze documents produced by Insurer #33 to identify potential deponents.	1.10	671.00
Sraders, S.	6/26/22	Analyze produced documents to determine potential deponents.	3.10	2,046.00
Shore, R.	6/27/22	Confer with R. Leveridge and J. Rubinstein re next steps (0.7); confer with potential expert re analysis and potentially available data (1.2); communicate with P. Breene re coverage issues (0.8); confer with other potential consultants re data (0.5); review materials from UCC counsel (2.3); review materials re claims analysis (0.4); analysis re same (0.6); analysis re litigation schedule (0.4).	6.90	10,005.00
Rubinstein, J.	6/27/22	Confer with R. Leveridge and R. Shore re strategy and open projects (0.7); revise proposed scheduling order (0.6); communicate with team re discovery issues (0.4); review issues re offensive deposition related preparation (1.1); confer with potential expert (1.2); review case law re multiple evidence related research issues (2.0); preparation re Debtors' Rule 30(b)(6) deposition testimony (1.9).	7.90	6,715.00
Rush, M.	6/27/22	Review materials and issues in preparation for deposition.	3.90	2,730.00
Rush, M.	6/27/22	Review relevant case law.	.40	280.00
Gaske, A.	6/27/22	Analyze documents produced by Insurer #9 to identify potential deponents.	1.20	732.00
Gaske, A.	6/27/22	Analyze documents produced by Insurer #23 to identify potential deponents.	2.60	1,586.00
Gaske, A.	6/27/22	Confer with J. Rubinstein re strategy for identifying potential deponents.	.20	122.00
Gaske, A.	6/27/22	Analyze more documents produced by Insurer #33 to identify potential deponents.	1.20	732.00
Leveridge, R.	6/27/22	Confer with R. Shore and J. Rubinstein re action items (0.7); review deposition outline (0.7); review materials re experts' work (0.6); review legal research (0.7).	2.70	3,915.00

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Leveridge, R.	6/27/22	Confer with potential expert, R. Shore and J. Rubinstein.	1.20	1,740.00
Sraders, S.	6/27/22	Continue analyzing produced documents to identify potential deponents.	2.10	1,386.00
Turner, C.	6/27/22	Review and organize R. O'Connor deposition materials.	.90	180.00
Hubbard, B.	6/27/22	Review correspondence from potential expert.	.80	340.00
Agwu, I.	6/27/22	Continue reviewing W. Chang documents in preparation for upcoming deposition.	2.00	840.00
Shore, R.	6/28/22	Review and provide comments to draft policy stipulation (1.3); analysis re Rule 30(b)(6) deposition (2.4); outline strategy for Issue #27 (1.3).	5.00	7,250.00
Rubinstein, J.	6/28/22	Communicate with Navigators re revisions to draft policy stipulation (0.2); communicate with team re offensive depositions (0.3); correspond with co-plaintiff counsel re discovery and case schedule (1.4).	1.90	1,615.00
Gaske, A.	6/28/22	Revise list of potential insurer deponents.	.60	366.00
Gaske, A.	6/28/22	Revise draft policy stipulation for Navigators to incorporate J. Rubinstein comments.	1.30	793.00
Gaske, A.	6/28/22	Review portion of R. O'Connor deposition transcript.	.30	183.00
Leveridge, R.	6/28/22	Review discovery and case schedule (0.5); provide comments to draft communication to co-counsel re same (0.7).	1.20	1,740.00
Sraders, S.	6/28/22	Correspond with J. Rubinstein re proposed deponents.	.40	264.00
Turner, C.	6/28/22	Review and organize Issue #46 briefing.	.40	80.00
Agwu, I.	6/28/22	Review W. Chang documents in preparation for upcoming deposition.	3.00	1,260.00
Shore, R.	6/29/22	Continue analysis re Rule 30(b)(6) deposition (3.2); confer with J. Rubinstein re various litigation issues (0.5); further analysis re Issue #27 (2.8).	6.50	9,425.00
Hudson, J.	6/29/22	Summarize insurance recovery efforts to date.	1.80	1,413.00
Girgenti, J.	6/29/22	Review and identify key documents for Marsh deposition preparation.	4.00	1,460.00
Rubinstein, J.	6/29/22	Confer with R. Shore re various litigation projects (0.5); review and provide comments to status report to Court (0.2); communicate with team re expert retentions (0.2).	.90	765.00
Martinez, S.	6/29/22	Review and organize incoming R. O'Connor deposition transcript and exhibit materials.	.10	32.50

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Gaske, A.	6/29/22	Revise policy stipulation for Navigators incorporate comments from R. Shore.	1.10	671.00
Leveridge, R.	6/29/22	Communicate with co-counsel re case administration and response to Court request for status report (0.4); review and provide comments to draft report (0.8).	1.20	1,740.00
Turner, C.	6/29/22	Review and organize R. O'Connor deposition materials.	2.70	540.00
Hubbard, B.	6/29/22	Confer with potential expert.	1.00	425.00
Agwu, I.	6/29/22	Review W. Chang documents in preparation for upcoming deposition.	4.50	1,890.00
Shore, R.	6/30/22	Review expert retention agreement (0.7)); confer with R. Leveridge and J. Rubinstein re same (0.4); review and revise note to client re Judge Drain, Judge Lane, and retention of experts (0.7); confer with team re litigation status (1.0); analysis re litigation status and strategy (2.1); analysis re Issue #27 (1.7); review spreadsheet re data sources (0.4).	7.00	10,150.00
Girgenti, J.	6/30/22	Confer with team re litigation status.	1.00	365.00
Girgenti, J.	6/30/22	Review and identify key documents for Marsh deposition preparation.	3.90	1,423.50
Rubinstein, J.	6/30/22	Analysis re retention of experts (0.5); correspond with potential experts (0.2); revise retention agreement (0.8); confer with R. Leveridge and R. Shore (0.4); update litigation task list (0.7); confer with team re litigation status and strategy (1.0); revise case update to court (0.4); review draft client update (0.3); review materials and issues in preparation for Debtors' Rule 30(b)(6) deposition (0.5); correspond with co-plaintiffs re offensive discovery case schedule (0.2); review questions re various document reviews (0.2); communicate with co-plaintiffs re deposition protocol (0.7).	5.90	5,015.00
Sanchez, J.	6/30/22	Confer with team re status of case and strategy.	1.00	475.00
Sanchez, J.	6/30/22	Review document collection in preparation for defensive depositions.	2.00	950.00
Martinez, S.	6/30/22	Review and finalize updating databases re incoming R. O'Connor deposition materials.	.50	162.50
Martinez, S.	6/30/22	Review and organize incoming privilege and redaction logs from Insurers #15 and #27.	.20	65.00
Martinez, S.	6/30/22	Confer with team re case status and next steps.	1.00	325.00
Bonesteel, A.	6/30/22	Confer with team re ongoing case strategy.	1.00	375.00
Bonesteel, A.	6/30/22	Identify select complaints for attorney review.	1.90	712.50

Invoice Number: 11327473
August 19, 2022

Name	Date	Services	Hours	Amount
Gaske, A.	6/30/22	Confer with team re litigation strategy and case status.	1.00	610.00
Gaske, A.	6/30/22	Review comments from UCC re Rule 30(b)(6) deposition topics.	.10	61.00
Gaske, A.	6/30/22	Review Insurer #33 response to policy stipulation proposal.	.30	183.00
Leveridge, R.	6/30/22	Communicate with potential experts re retention (0.3); review draft report to clients re same (0.7); communicate with co-counsel re same (0.3); confer with team re case status (1.0).	2.30	3,335.00
Leveridge, R.	6/30/22	Review communications from co-counsel re status report (0.2); review communications from opposing counsel re third-party discovery (0.2); communicate with co-counsel re litigation strategy (0.7).	1.10	1,595.00
Ogrey, S.	6/30/22	Confer with team re case strategy.	1.00	240.00
Sraders, S.	6/30/22	Confer with team re recent developments and strategy for next steps.	1.00	660.00
Kaminsky, E.	6/30/22	Confer with team re case update.	1.00	560.00
Turner, C.	6/30/22	Confer with team re strategy and case update.	1.00	200.00
Hubbard, B.	6/30/22	Confer with team re status and strategy.	1.00	425.00
Huddleston, D.	6/30/22	Confer with team re litigation update.	1.00	420.00
Huddleston, D.	6/30/22	Continue researching case law re discovery.	2.20	924.00
Agwu, I.	6/30/22	Continue reviewing W. Chang documents in preparation for upcoming deposition.	3.00	1,260.00
Agwu, I.	6/30/22	Confer with team re litigation update.	1.00	420.00
Project Total:			738.90	\$ 529,075.50
TOTAL CHARGEABLE HOURS			750.50	
TOTAL FEES				\$ 537,525.50

Invoice Number: 11327473
August 19, 2022

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	2.50	1,800.00	4,500.00
Quinn, K.	1.00	1,250.00	1,250.00
Shore, R.	78.60	1,450.00	113,970.00
Hudson, J.	7.10	785.00	5,573.50
Girgenti, J.	29.20	365.00	10,658.00
Rubinstein, J.	4.80	425.00	2,040.00
Rubinstein, J.	129.70	850.00	110,245.00
Sanchez, J.	32.50	475.00	15,437.50
Rush, M.	85.50	700.00	59,850.00
Martinez, S.	21.40	325.00	6,955.00
Bonesteel, A.	10.20	375.00	3,825.00
Gaske, A.	37.30	610.00	22,753.00
Leveridge, R.	51.00	1,450.00	73,950.00
Ogrey, S.	18.80	240.00	4,512.00
Sraders, S.	57.60	660.00	38,016.00
Kaminsky, E.	9.10	560.00	5,096.00
Turner, C.	65.40	200.00	13,080.00
Hubbard, B.	23.70	425.00	10,072.50
Huddleston, D.	20.30	420.00	8,526.00
Agwu, I.	64.80	420.00	27,216.00
TOTALS	750.50		\$ 537,525.50

TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	3.30	660.00
A009	Meetings / Communications with AHC & Creditors	2.00	3,050.00
A015	Non-Working Travel (Billed @ 50%)	4.80	2,040.00
A019	Plan of Reorganization / Disclosure Statement	1.50	2,700.00
A020	Insurance Adversary Proceeding	738.90	529,075.50

Invoice Number: 11327473
August 19, 2022

EXPENSE DETAILS

E110: Out-of-Town Travel

Date	Description	Task	Amount
6/15/22	Travel - Train Fare / Jason Rubinstein / Washington, DC to New York, NY (Roundtrip) / Attend O'Connor Deposition / June 13-14, 2022	E110	370.00
6/15/22	Travel - Parking / Jason Rubinstein / New York, NY / Attend O'Connor Deposition / June 13-14, 2022	E110	48.00
6/15/22	Travel - Lodging / Jason Rubinstein / New York, NY / Attend O'Connor Deposition / June 13-14, 2022	E110	550.00
6/15/22	Travel - Meals / Jason Rubinstein / New York, NY / Attend O'Connor Deposition / June 13-14, 2022	E110	100.78
Sub-Total of Expenses:			\$ 1,068.78

E115: Deposition Transcripts

Date	Description	Task	Amount
6/14/22	Depositions / Transcripts - Veritext, LLC - O'Connor Deposition - 2022.06.14	E115	1,415.20
Sub-Total of Expenses:			\$ 1,415.20

E118: Litigation Support Vendors

Date	Description	Task	Amount
5/31/22	Contracted Professional Fees / Cobra Legal Solutions / Litigation Support Vendor / May 2022	E118	2,284.96
6/30/22	Contracted Professional Fees / Cobra Legal Solutions, LLC / Litigation Support Vendor / June 2022	E118	1,266.36
Sub-Total of Expenses:			\$ 3,551.32

TOTAL EXPENSES **\$ 6,035.30**

TOTAL FEES AND EXPENSES **\$ 543,560.80**